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Remarks

Reconsideration of the application and allowance of all claims pending are respectfully requested. All claim language was previously recited and thus, no new matter has been added. Claims 1-8, 10-16, and 18-22 are pending.

Claim Rejections - 35 U.S.C. § 103

Claims 1-8, 10-16, and 18-22 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Burnham (U.S. Patent No. 6,968,205) in view of Tiliks et al. (U.S. Patent App. Pub. No. 2003/0099342; "Tiliks"). These rejections are respectfully, but most strenuously, traversed.

Applicant notes that while the introduction to the § 103 rejections in the Office Action makes reference to Tiliks, the arguments presented refer to Hefter et al. (U.S. Patent No. 7,155,204; "Hefter"). Accordingly, applicant's remarks refer to the citations to Hefter.

For explanatory purposes, applicant discusses herein one or more differences between the claimed invention and the Office Action's citations to Burnham and Hefter. This discussion, however, is in no way meant to acquiesce in any characterization that one or more parts of the Office Action's citations to Burnham or Hefter correspond to the claimed invention.

Applicant respectfully submits that the Office Action's citations to the applied references, with or without modification or combination, assuming, *arguendo*, that the modification or combination of the Office Action's citations to the applied references is proper, do not teach or suggest the toll-free call placed by the user of the communication device to the toll-free number associated with the mobile phone, as recited in applicant's independent claim 1.

Burnham (column 8, lines 29-49) discloses:

FIG. 5 is a schematic diagram of an embodiment of the present invention. A user can access telephone 165 and dial a toll-free nationwide or regional number for providing landline access to a wireless network. Telephone 165 can be coupled to switch 563 of PSTN 560 after the user dials the toll-free number (step 501) to initiate the call. A query can be sent to SCP 565 to determine a local MLH to which the call can be connected based on the telephone number of telephone 165 (step 502). The SCP 565 can send a response to the switch 563 (step 503) indicating the identity of the local MLH, and the switch 563 can connect the call to the local MLH 567 (step 504). The local MLH 567 includes a port to the wireless network 530, and the call is connected to the wireless network 530 (step 505). After the wireless network 530 receives valid authorization information and call completion instructions from telephone 165, the call can be completed to telephone 166 (step 506). Telephone 166 can be typically coupled to wireless network 530 (i.e., a mobile telephone), to PSTN 560 (i.e., a landline telephone), a combination thereof (i.e., a fixed-location wireless telephone), and so on.

Burnham discloses that the toll-free number is connected to the local multi-line hunt group (MLH) 567. The MLH 567 includes a port to the wireless network 530. After the wireless network 530 receives valid authentication information *and call completion instructions* from the telephone 165, the call can be completed to telephone 166. Applicant respectfully submits that the toll-free number is not associated with the mobile telephone and is instead associated with the MLH.

As disclosed by Burnham, additional call completion instructions are necessary to deliver the call to the telephone 166. Burnham (column 6, lines 55-64) discloses:

After wireless network 130 has authorized the user, wireless network 130 can complete the subscriber's call based on the call completion information received from the subscriber. For example, subscriber 200 can instruct wireless network 130 to place a call to telephone 166 coupled to landline network 160. Accordingly, after wireless network 130 has authorized the user and received the call completion information, wireless network 130 can communicate with landline network 160 to complete the call through to telephone 166 (steps 203 and 204).

Burnham discloses that the call completion information is used to instruct the wireless network to place the call to the telephone. Burnham further discloses (column 6, lines 12-17):

After user 101 has successfully authenticated herself to the wireless network 130, she can enter a telephone number (e.g., by dialing DTMF digits, by speaking the digits, by speaking a phrase associated with a number, etc.), and wireless network 130 can place the call.

Burnham discloses entering a second telephone number for placing the call to the telephone 166. Accordingly, the toll-free number is not associated with the telephone 166. Burnham fails to disclose that the toll-free call placed by the user of the communication device to the toll-free number is associated with the mobile phone.

Accordingly, the Office Action's citation to Burnham fails to satisfy at least one of the limitations recited in applicant's independent claim 1.

Hefter (column 1, lines 63-67) discloses:

System and methods consistent with the present invention satisfy the above-described need by enabling subscribers to transfer the airtime charge for a sending wireless telephone station to the toll free call provider to whom a wireless toll-free telephone call is placed.

Hefter discloses enabling subscribers to transfer airtime charges for a sending wireless telephone station. Hefter fails to disclose a wireless telephone station that receives a toll-free call from a communication device. Hefter fails to disclose that the toll-free call placed by the user of the communication device to the toll-free number is associated with the mobile phone.

Accordingly, the Office Action's citation to Hefter fails to satisfy at least one of the limitations recited in applicant's independent claim 1.

The Office Action's citations to Burnham and Hefter all fail to meet at least one of applicant's claimed features. For example, there is no teaching or suggestion in the Office Action's citations to Burnham or Hefter of the toll-free call placed by the user of the

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communication device to the toll-free number is associated with the mobile phone, as recited in applicant's independent claim 1.

For all the reasons presented above with reference to claim 1, claims 1, 12, and 20 are believed neither anticipated nor obvious over the art of record. The corresponding dependent claims are believed allowable for the same reasons as independent claims 1, 12, and 20, as well as for their own additional characterizations.

Withdrawal of the § 103 rejections is therefore respectfully requested.

In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicant's attorney.

Respectfully submitted,



Carmen B. Patti
Attorney for Applicant
Reg. No. 26,784

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CARMEN B. PATTI & ASSOCIATES, LLC
Customer Number 47382